

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ALABAMA  
NORTHERN DIVISION

IN RE:

CASE NO. 12-83138-JAC-7

SHARON S. HEINZ  
SSN: xxx-xx-3220  
Debtor.

CHAPTER 7

Emergency Motion to Abandon Property

Comes now, Creditors, Nick and Bonnie Lorraine Lioce ("Lioces"), and seek the trustee to abandon certain property of the debtor Sharon S. Heinz under Rule 6007 and 11 USC § 554 as such property is of inconsequential value and benefit to the estate or otherwise burdensome to the estate or for such other reasons as may be determined. Such property is namely the Automobiles, trucks, trailers, and other vehicles and accessories disclosed by the debtor in her personal property schedules as follows (Doc. #17 pg. 6):

Vehicle listed as disclosed	Debtor's Claimed Value
1996 Isuzu NPR Dump Truck	\$3,000.00
1991 GMC 6500 Dump Truck (Doesn't Run)	\$2,000.00
2003 Lincoln Navigator (Doesn't Run)	\$500.00
2006 Ford F150	\$2,500.00
2004 BMW 530i	\$10,500.00
2002 Ford F250	\$2,000.00

Debtor claims no personal exemptions on these vehicles except the BMW. (Doc. #17 pg. 8, Doc. #29-1 pg. 15). Debtor claims Sam Whiteside as having a security agreement for the full value of the BMW (Doc. #17 pg. 10). Considering the time and costs of liquidation, the vehicles are of inconsequential value and benefit to the estate and should therefore be abandoned. The Lioces request an expedited hearing on the same.

Respectfully Submitted,

/s/ Gregory H. Revera\_\_\_\_\_

Gregory H. Revera

M. Paul Killian

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**CERTIFICATE OF SERVICE**

I, Gregory H. Revera, do hereby certify that I have this day served a copy of the foregoing instrument, by placing copies of same in the U.S. Mail, postage prepaid and properly addressed to the following:

Hon. Judith Thompson, Trustee  
PO Box 18966  
Huntsville, AL 35804

And to all Creditors listed on the Mailing Matrix as attached hereto.

This the 27th of November, 2012.

/s/ Gregory H. Revera  
Gregory H. Revera